

### **REMARKS**

In a Final Office Action dated April 15, 2011 ("Office Action"), the Examiner rejected claims 33-60 under 35 U.S.C. §103(a) as allegedly being unpatentable over what the Examiner characterizes as Applicants' Admitted Prior Art ("AAPA") in view of U.S. Patent Application Publication No. 2003/0018491 to Nakahara et al. ("*Nakahara*"). By this Amendment, Applicants have amended claims 33, 47, and 60. Further, Applicants have amended the specification to correct minor typographical errors. These amendments add no new matter and are fully supported by the original as-filed specification. Applicants respectfully traverse the aforementioned rejections and request reconsideration based on the following remarks. In addition, Applicants do not necessarily agree with or acquiesce in the Examiner's characterization of the claims or the cited references, even if those characterizations are not addressed herein.

### **Claim Rejections Under 35 U.S.C. §103**

Claims 33-60 stand rejected under 35 U.S.C §103(a) as allegedly being unpatentable over *AAPA* in view of *Nakahara*. *Office Action*, pp. 3-10. Applicants respectfully request reconsideration the rejection of claims 33-60 under 35 U.S.C. §103 for at least the reason that the references cited by the Examiner, whether viewed separately or in any combination thereof, fail to disclose or suggest each and every element recited in the amended claims at issue.

Amended claim 33 recites, *inter alia*, a method of generating an Authorized Domain that includes:

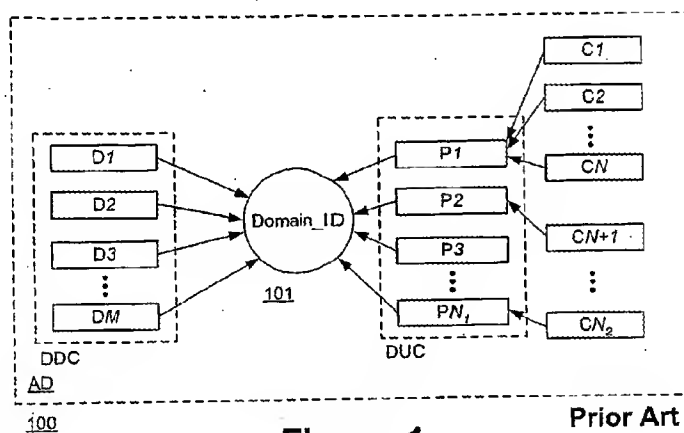
"... binding at least one device to at least one user, such that the at least one device is directly linked to the at least one user and is indirectly linked to [a] domain identifier through the at least one user, by obtaining or generating a Device Owner List comprising a unique identifier for a user and a unique identifier for each device belonging to the user, thereby defining that the at least one device is bound to the user, or obtaining or generating a Device Owner List for each device to be bound, the Device Owner List comprising a unique identifier for a user and a unique identifier for

a device belonging to the user, thereby defining that the device is bound to the user.”

*Emphasis added.*

Applicants respectfully submit that *AAPA* and *Nakahara* collectively fail to disclose or suggest at least these claimed features.

*AAPA* generally discusses “device based AD” systems wherein only a specific set of devices are bound to an authorized domain independent of users, and “person based AD” systems wherein only a specific set of users are bound to an authorized domain independent of devices. See *AAPA* at page 2, line 21 – page 3, line 11. In addition, *AAPA* discusses and illustrates in Figure 1, reproduced below, a “hybrid person and device based authorized domain.” *AAPA* at page 3, lines 12-13.



**Figure 1**

As shown in Figure 1, *AAPA* discloses that devices (e.g., D1, D2, etc.) may be bound to the Authorized Domain by linking directly to a “Domain Identifier.” Further, *AAPA* discloses that persons (e.g., P1, P2, etc.) may also be bound to the Authorized Domain by linking directly to the “Domain Identifier.” See *AAPA* at page 3, lines 12–22 and page 8, line 12 – page 10, line 10. In this manner, the *AAPA* generally discloses a hybrid Authorized Domain that incorporates features of both the “device based AD” systems and “person based AD” systems.

*AAPA* fails to disclose or suggest, however, a method including “binding at least one device to at least one user, such that the at least one device is directly linked to the at least one user and is indirectly linked to [a] domain identifier through the at least one user,” as recited in amended claim 33. *Emphasis added.* Rather, as discussed above, *AAPA* is limited to disclosing a system wherein devices are not “directly linked to ... at least one user” nor “indirectly linked to [a] domain identifier” as claimed, but rather are directly linked to a domain identifier. This conclusion is supported by the Examiner’s own assertion in the Office Action that “devices [in *AAPA*] are bound to the users through the domain identifier.” *Office Action at page 4.* That is, rather than “devices” being “directly linked to ... at least one user” and “indirectly linked to [a] domain identifier through ... [a] user,” as recited in amended claim 33, devices in the *AAPA* are indirectly associated with a user by linking through a common domain identifier that they are directly linked to. Accordingly, *AAPA* fails to disclose or suggest each and every element recited in amended claim 33.

*Nakahara* fails to cure at least the aforementioned deficiencies of *AAPA*. *Nakahara* generally discloses a content usage device and a network system, and a license information acquisition method for effectively using license information distributed from a server. *See Nakahara at paragraph [0001].* Nowhere, however, does *Nakahara* disclose suggest “binding at least one device to at least one user, such that the at least one device is directly linked to the at least one user and is indirectly linked to [a] domain identifier through the at least one user,” as recited in amended claim 33. Accordingly, *Nakahara* fails to cure at the deficiencies of *AAPA*.

For at least the above reasons, *AAPA* and *Nakahara*, whether viewed separately or in any combination thereof, fail to disclose or suggest each and every element recited in amended claim 33 and, therefore, do not render amended claim 33 obvious. Amended independent claims 47 and 60, although different in scope, recite elements similar to amended claim 33, and are not rendered obvious by *AAPA* and *Nakahara* for at least the same reasons as amended

claim 33. Accordingly, Applicants respectfully submit that independent claims 33, 47, and 60 are allowable over the combination of *AAPA* and *Nakahara*. Claims 34-46 and 48-59 depend from one of claims 33 and 47, and are allowable for at least the same reasons as the claim from which they depend. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection of claims 33-60 under 35 U.S.C. §103.

**Conclusion**

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to Deposit Account 06-0916.

Respectfully submitted,

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